

1 EDMUND G. BROWN JR.
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 KIM M. SETTLES
Deputy Attorney General
4 State Bar No. 116945
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 622-2138
Facsimile: (510) 622-2270
7 *Attorneys for Complainant*

8
9
10 **BEFORE THE**
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Petition to Revoke Probation
14 Against:

Case No. OT2008-13-S

15 **TERRI ANN SCHONBROD**
16 **15551 Tracy Street, Apt. C**
San Lorenzo, California 95630
17 **Occupational Therapist License No. OT 6305**

**AMENDED PETITION TO REVOKE
PROBATION**

18 Respondent.

19
20 Complainant alleges:

21 **PARTIES**

22 1. Heather Martin (Complainant) brings this Amended Petition to Revoke Probation
23 solely in her official capacity as the Executive Officer of the Board of Occupational Therapy,
24 Department of Consumer Affairs.

25 2. On or about February 14, 2003, the California Board of Occupation Therapy issued
26 Occupational Therapist License Number OT 6305 to Terri Ann Schonbrod (Respondent). The
27 Occupational Therapist License was in effect at all times relevant to the charges brought herein
28 and will expire on March 31, 2012, unless renewed.

3. In a disciplinary action entitled *In the Matter of the Accusation Against Terri Ann Schonbrod*, Case No. OT2008-13, the Board of Occupational Therapy issued a decision, effective December 29, 2009, in which Respondent's Occupational Therapist License No. OT6305 was revoked. However, the revocation was stayed and Respondent's license was placed on probation for a period of three (3) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

JURISDICTION

4. This Amended Petition to Revoke Probation is brought before the California Board of Occupational Therapy ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code ("Code") unless otherwise indicated.

5. Section 2570.26, subdivision (a) of the Codes states:

"The board may, after a hearing, deny, suspend, revoke, or place on probation a license, certificate, inactive license, inactive certificate, or limited permit."

6. Section 2570.30 of the Code states:

“The board shall retain jurisdiction to proceed with any investigation, action or disciplinary proceeding against a license, or to render a decision suspending or revoking a license, regardless of the expiration, lapse, or suspension of the license by operation of law, by order or decision of the board or a court of law, or by the voluntary surrender of a license by the licensee.”

FIRST CAUSE TO REVOKE PROBATION

7. At all times after the effective date of Respondent's probation, Condition 14 stated that Respondent shall abstain from the use of alcohol. Grounds exist for revoking the probation and for imposing the revocation penalty that was stayed because Respondent tested positive for the presence of alcohol in random tests conducted on January 29, 2010, February 4, 2010, and July 6, 2010.

11

//

//

- 1.
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5

6
7

8
9
10

11

12

13

14
15

16
17

18

19
20

21
22

24